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Supreme Court, U.S.
FILED
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No. 98-1867

In The

Supreme Court of the United States

October Term, 1998

Fred Davis

Petitioner,

v.

Anthony Lauria
Hanover Insurance Company

Respondents.

Petition For Writ Of Certiorari
To The Massachusetts Supreme Judicial Court

PETITIONER'S REPLY BRIEF

Fred Davis
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4RP

I. PETITIONER'S UNITED STATES CONSTITUTIONAL RIGHTS HAVE BEEN VIOLATED

Respondents and their attorney, George R. Suslak are telling falsehoods and misrepresenting the facts to this Honorable Court in the same manner as they have done in the inferior courts.

Petitioner's United States Constitutional Rights Amendments V and XIV have been violated and the respondents show no evidence that petitioner received due process of law or equal protection of the law.

II. HANOVER INSURANCE COMPANY & GEORGE R. SUSLAK ARE PARTIES TO THIS ACTION

Hanover is a party to this action. Hanover is the insurer of Anthony Lauria making Hanover liable for the tort committed by Lauria. Hanover has engaged the services of George R. Suslak to represent them, therefore, it is appropriate for Hanover to be a party to this action.

Respondents show no evidence that Hanover is not a proper party.

George R. Suslak, since he is an attorney for Hanover, he has acted in bad faith, violated Canon Rules and Attorney's Oath, he has made himself a party to this action because of his misconduct.

III. PETITIONER WAS NOT NOTIFIED CASE WAS REPORTED SETTLED

Respondent and their attorney, Suslak fortified, the fact, that the petitioner was not notified the case was reported settled SEE respondent's app. p. 5. the Honorable Court can clearly

see that petitioner was not notified, therefore, the respondents and their attorney Suslak are not telling the truth when they state "petitioner was notified".

A research by the petitioner with the inferior courts on October 9, 1991 there was no one employed by the name "Whitman" nor has there even been an employee by the name of "Whitman" in their court system SEE **respondent's app. p.5.**

The respondents show no evidence who informed the court that the case was settled.

Respondents and Suslak are telling falsehoods to the court when they state "petitioner has full and proper notice of all procedures before the Massachusetts Court" SEE **respondents brief pages 6 and 7.**

IV. FRAUDULENT LIEN WAS FILED BEARING THE NAME OF STUART RAVECH

A fraudulent lien was filed in the court approximately six months after the so-called reported settled entry. SEE **respondents app.p.5.**

Notices were not mailed to either the petitioner nor the respondents. There was no hearing on said lien nor is there any ruling from the court on the fraudulent document that does not bear the true signature of Stuart Ravech. SEE **respondents app. p.5.**

Respondents and their attorney, Suslak shows no evidence that the court allowed any lien on this action.

V. RESPONDENTS AND THEIR ATTORNEY SUSLAK ARE ENGAGED IN A NEW COVER-UP

In the inferior courts they used the cover-up that "action was settled", in which the inferior court erred in believing them without any evidence that was presented to them.

Now they are engaged in using the cover-up that the case was "reported settled", which means absolutely nothing.

Respondents and their attorney Suslak show no evidence that monies were rendered to the petitioner.

Their acts are designed for cover-ups and an obstruction of justice.

VI. RESPONDENTS AND THEIR ATTORNEY SUSLAK DO NOT DENY THE FACTS SET FORTH IN PETITIONER'S PETITION

Respondent and their attorney Suslak do not deny petitioner received a permanent disability because of Hanover Insurance Company's insurer Anthony Lauria's negligence.

They do not deny petitioner lost approximately $46,000.00 in wages which resulted in the premanent loss of employment.

They do not deny petitioner was not paid for his medical bills, lost wages, for injuries, pain and suffering and not paid for damages of his motor vehicle.

Petitioner is entitles to these monies as a matter of law.

VII. HANOVER INSURANCE COMPANY SHOULD BE BAN FROM CONDUCTING BUSINESS IN THE UNITED STATES

Based on the facts and evidence Hanover Insurance Company engaged in fraud, deceit and the obstruction of justice, in order, to steal monies from the petitioner.

Hanover Insurance should be ban from conducting business in the United States for their unfair and deceptive business practices.

Hanover Insurance Company and its attorney Suslak have made libelous remarks against the petitioner of "unintelligible"

Based on the facts and evidence Hanover Insurance Company should be ban from conducting business in the United State protecting the public interest.

George R. Suslak should be disbar for his continuing miscoduct and libelous remarks against the petitioner.

CONCLUSION

Based on the foregoing facts and evidence, the petition for a Writ of Certiorari should be granted.

Respectfully submitted,

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